

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

Form OBD-68
(Rev 10-14-76)
Formerly DJ-307
for

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents
Registration Act of 1938, as amended.

OMB
No. 43-R226
Approval Expires Oct. 31, 1981

RECEIVED
CRIMINAL DIVISION

APR 14 4 30 PM '81

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

1. Name of Registrant

ARNOLD & PORTER

2. Registration No.

1750

3. This amendment is filed to accomplish the following indicated purpose or purposes:

☐ To correct a deficiency in

☐ Initial Statement

☐ Supplemental Statement
for _____

☐ To give notice of change in an
exhibit previously filed.

☒ To give a 10-day notice of a change in infor-
mation as required by Section 2(b) of the Act.

☐ Other purpose (specify) _____

4. If this amendment requires the filing of a document or documents, please list -

Exhibits A and B

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

This amendment to Registrant's Registration Statement is to give notice of a foreign principal of the Registrant, Kawasaki Heavy Industries, Ltd., and to file the necessary Exhibits A and B.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Brooksley E. Landau
Brooksley E. Landau

Partner

Subscribed and sworn to before me at Washington, D. C.

this 14th day of April, 19 81

My commission expires My Commission Expires March 14, 1985

Susan E. W. Wolski
Notary Public
D.C.

EXHIBIT A
TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant ARNOLD & PORTER 1200 New Hampshire Avenue, N.W. Washington, D. C. 20036		2. Registration No. 1750
3. Name of foreign principal Kawasaki Heavy Industries, Ltd.	4. Principal address of foreign principal 4-1, 2 Chome, Hamamatsu-Cho Minato-Ku, Tokyo, Japan	
5. Indicate whether your foreign principal is one of the following type: <input type="checkbox"/> Foreign government <input type="checkbox"/> Foreign political party <input checked="" type="checkbox"/> Foreign or <input type="checkbox"/> domestic organization: If either, check one of the following: <div style="display: flex; justify-content: space-between;"><div><input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Association</div><div><input type="checkbox"/> Committee <input type="checkbox"/> Voluntary group <input type="checkbox"/> Other (specify) _____</div></div> <input type="checkbox"/> Individual - State his nationality _____		
6. If the foreign principal is a foreign government, state: <div style="text-align: right;">N.A.</div> a) Branch or agency represented by the registrant. b) Name and title of official with whom registrant deals.		
7. If the foreign principal is a foreign political party, state: <div style="text-align: right;">N.A.</div> a) Principal address b) Name and title of official with whom the registrant deals. c) Principal aim		
8. If the foreign principal is not a foreign government or a foreign political party, a) State the nature of the business or activity of this foreign principal The foreign principal is a manufacturing corporation.		

TERMINATED
DATE 6-30-81

b) Is this foreign principal

- Owned by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Directed by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Controlled by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Financed by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

We believe, without knowledge, that the foreign principal is owned, controlled and financed by foreign persons and institutions.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N.A.

Date of Exhibit A April 14, 1981	Name and Title Brooksley E. Landau, Partner	Signature <i>Brooksley E. Landau</i>
-------------------------------------	--	---

UNITED STATES DEPARTMENT OF JUSTICE
Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT
Under the Foreign Agents Registration Act
of 1938, as amended

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
ARNOLD & PORTER	Kawasaki Heavy Industries, Ltd.

Check Appropriate Boxes:

- ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- ☒ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence. */
- ☐ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

*/ Two copies of excerpts of the relevant portions of pertinent correspondence relating to retention of the Registrant by the foreign principal are attached hereto.

- Describe fully the nature and method of performance of the above indicated agreement or understanding.

The Registrant will represent the foreign principal with respect to actions of the U.S. Government that might restrict exports of a product manufactured by the foreign principal under license from a U.S. company to third countries. The fee for such representation is to be determined periodically based on usual hourly charges and other criteria for legal fees, plus out-of-pocket expenses. The duration of the agreement is indefinite.

TERMINATED
DATE 6-30-81

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The Registrant will represent the foreign principal to assist in obtaining approval by the U.S. Government for the sale of products to third countries.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?^{1/} Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant may engage in political activities on behalf of the foreign principal. The Registrant's activities may on occasion include communications on behalf of the foreign principal with Executive Branch officials, officials of government agencies, and with members of the U.S. Senate and House of Representatives and their staffs relating to obtaining approval of the sale to third countries of products manufactured by the foreign principal under license from a U.S. company.

Date of Exhibit B	Name and Title	Signature
April 14, 1981	Brooksley E. Landau Partner	<i>Brooksley E. Landau</i>

^{1/} Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

EXCERPTS FROM TELEX DATED APRIL 1, 1981

TO: WILLIAM D. ROGERS, ESQ.
RE: KHI
DATE: APR 1, 1981

RECEIVED
APR 1 1981

AAA MR. HAKURA WHO IS IN CHARGE OF KHI OPERATIONS IN SAUDI HAS NOW RETURNED AND TODAY HE AUTHORIZED ME TO CONTACT YOU TO EXPEDITE THE APPROVAL PROCESS OF THE AMERICAN GOVERNMENT IN CONNECTION WITH KHI'S POSSIBLE CONTRACT TO SUPPLY THE S. A. GOVT WITH 10 HELICOPTERS AND RELATED SUPPLIES AND SERVICES. AND I AM SO DOING BY THIS TELEX.

. . . .

. . . KHI IS CONCERNED ABOUT THE TIME INVOLVED IN THE APPROVAL PROCESS AND WOULD APPRECIATE YOUR ASSISTANCE TO ENSURE THAT IT WILL MEET ITS TIME OBJECTIVES.

. . . .

DDD IT IS UNNECESSARY TO TELL YOU THAT KHI AND I WILL APPRECIATE YOUR EFFORTS IN THIS CONNECTION. PLEASE KEEP ME ADVISED BY TELEPHONE OR TELEX AS TO DEVELOPMENTS.

WARMEST REGARDS,

MIKE BRAUN/LAWYER J

TERMINATED

DATE 6-2-81